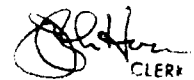


FILED

DEC 02 2014

  
CLERK

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

---

UNITED STATES OF AMERICA,

Plaintiff,

vs.

XAVIER CORNELIUS SHIELDS,  
RYAN VINCENT HILL,  
DWIGHT DOMINIC DANIELS, and  
DEMARCUS Q. STEVENS,

Defendants.

---

CR 14-40140-01  
-02  
INDICTMENT -03  
-04

Conspiracy to Commit Bank Fraud;  
Bank Fraud

18 U.S.C. §§ 1344, 1349

The Grand Jury charges:

COUNT 1.

Beginning on or about August 26, 2013 and continuing through September 24, 2013, in Sioux Falls, in the District of South Dakota and elsewhere, Defendants Xavier Cornelius Shields, Ryan Vincent Hill, Dwight Dominic Daniels, and Demarcus Q. Stevens did knowingly and willfully conspire and agree together and with each other, and with others both known and unknown to the Grand Jury, to commit the offense of bank fraud, in violation of 18 U.S.C. §§ 1344 and 1349. Defendants, with the intent to defraud, knowingly conspired to execute and attempt to execute a scheme and artifice to defraud financial institutions, including First Dakota National Bank, Great Western Bank, First National Bank, First Premier Bank, Wells Fargo Bank, and US Bank, whose deposits were, at the time of the offense, insured

by the Federal Deposit Insurance Corporation (FDIC), and to obtain the money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, the aforementioned financial institutions, by means of false or fraudulent pretenses, representations, and promises. Defendants' actions were all in violation of 18 U.S.C. §§ 1344 and 1349.

## COUNT 2.

Beginning on or about August 26, 2013 and continuing through September 24, 2013, in Sioux Falls, in the District of South Dakota and elsewhere, Defendants Xavier Cornelius Shields, Ryan Vincent Hill, Dwight Dominic Daniels, and Demarcus Q. Stevens knowingly executed and attempted to execute a scheme and artifice to defraud financial institutions, including First Dakota National Bank, Great Western Bank, First National Bank, First Premier Bank, Wells Fargo Bank, and US Bank, whose deposits were, at the time of the offense, insured by the Federal Deposit Insurance Corporation (FDIC), and to obtain the money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, the aforementioned financial institutions, by means of false or fraudulent pretenses, representations, and promises. Specifically, Defendants recruited individuals to cash fraudulent checks drawn on the bank accounts of area businesses. Defendants paid these individuals a small fee and then kept most of the proceeds for themselves. Defendants' actions were all in violation of 18 U.S.C. § 1344.

## FORFEITURE ALLEGATION

1. The allegations contained in this indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. §§ 492 and 982(a)(2)(B).

2. If convicted of an offense set forth above, Xavier Cornelius Shields, Ryan Vincent Hill, Dwight Dominic Daniels, and Demarcus Q. Stevens, the Defendants herein, shall forfeit to the United States any and all materials or property used or intended to be used in the commission of bank fraud, or property derived from or the proceeds of the bank fraud. Such property includes, but is not limited to:

- A. Brother GX6750 electronic typewriter, with serial number L2K106633.
- B. Items taken from the Defendants' possession on September 25, 2013, including genuine U.S. currency and a Sony Playstation 3.

A TRUE BILL:

**NAME REDACTED**

\_\_\_\_\_  
Foreperson

BRENDAN V. JOHNSON  
United States Attorney

By: 